

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action

Lead Case No.:

3:21-CV-00259-DCG-JES-JVB

**CONSOLIDATED PLAINTIFFS' AMENDED OBJECTIONS TO DEFENDANTS'  
EXHIBITS**

Plaintiffs and Plaintiff-Intervenors in the above-captioned consolidated action (“Plaintiffs”) respectfully submit the following amended objections to Defendants’ exhibits. This list is amended to address Defendants’ Exhibits 526 through 543, which were identified by Defendants since their initial Exhibit List was filed on May 2, 2025 (ECF No. 940).

Per Federal Rule of Civil Procedure 26(a)(3)(B), Plaintiffs reserve their right to object to any exhibit based on relevance under Federal Rule of Evidence 402, or any basis under Federal Rule of Evidence 403. Plaintiffs reserve the right to revise or supplement these objections within a reasonable time before trial or due to newly received information. Plaintiffs also reserve the right to object to any demonstratives or exhibits improperly used for impeachment.

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
001	Initial Expert Report of John R. Alford, Ph.D.	Hearsay, FRE 802 (unless testifying)
002	Dr. Alford's Rebuttal Report	Hearsay, FRE 802 (unless testifying)
003	2022 0718 Alford Report Texas.pdf	Hearsay, FRE 802 (unless testifying)
004	Alford Report Texas March 31 2025.pdf	Hearsay, FRE 802 (unless testifying)
005	2025 0416 Alford Report Texas.pdf	Hearsay, FRE 802 (unless testifying)
006	Dr. Alford's CV	Hearsay, FRE 802 (unless testifying)
007	Alford CV March 2025 consulting.pdf	Hearsay, FRE 802 (unless testifying)
008	2022 0723 Expert report of Sean Trende.pdf	Hearsay, FRE 802 (unless testifying)
009	Dr. Sean Trende Supplemental Expert Report Apr 1, 2025.pdf	Hearsay, FRE 802 (unless testifying)
010	2025 0417 Trende Suppl-Reply Expert Report.pdf	Hearsay, FRE 802 (unless testifying)
011	Rep. Kay Granger 9/30/21 statement in support of SB6	Hearsay, FRE 802
012	Congressman Written Testimony in Support of Map	Hearsay, FRE 802
013	Congressman Carter Written Test in Support	Hearsay, FRE 802
014	Congressman written test. in support	Hearsay, FRE 802
015	Congressman Gonzalez written test. in support	Hearsay, FRE 802
016	Rep. Ronny Jackson written test in support	Hearsay, FRE 802
017	Senate Special Committee on Redistricting: Regional Hearing Dates and Focus Areas	
018	Huffman letter RE: participation/interpreter	Hearsay, FRE 802
019	Rep. Roy written testimony in support	Hearsay, FRE 802
020	Senate Research Center 09/27/2021 Letter to Senate Special Committee on Redistricting re Redistricting Hearing on 09/24/2021	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
021	Senate Research Center 09/29/2021 Letter to Senate Special Committee on Redistricting re Redistricting Hearing 09/28/2021	
022	Email Correspondence from Sean Opperman to Stephanie Swanson re Sen. Huffman Letter	Hearsay, FRE 802
023	Huffman letter to LWVT RE: participation	Hearsay, FRE 802
024	Huffman letter to Rivera RE: participation/notice	Hearsay, FRE 802
025	Email Correspondence from Sean Opperman re Sen. Huffman Letter	Hearsay, FRE 802
026	Email from Opperman to Ashley Cheng re: helping witnesses videoconference in for testimony	Hearsay, FRE 802
027	Congressman Brady written statement in support	Hearsay, FRE 802
028	Rep. McCaul written testimony in support	Hearsay, FRE 802
029	Congressman Williams written test. in support	Hearsay, FRE 802
030	Opperman and Perales email thread RE SB 6	Hearsay, FRE 802
031	Statements in support of SB 6 by 11 congress people	Hearsay, FRE 802
032	Opperman and Joaquin Gonzalez email exchange	Hearsay, FRE 802
033	Huffman to Gonzalez RE: transparency/participation	Hearsay, FRE 802
034	Communications between Opperman and Joaquin Gonzalez	Hearsay, FRE 802
035	Letter of Sen. Huffman announcing public portal	
036	Opperman FWD Huffman email to LWVTX RE: participation	Hearsay, FRE 802
037	Sen. Huffman's office promoting Fair Maps' hosted meeting taking public testimony	Hearsay, FRE 802
038	Senate Special Committee on Redistricting Tentative Regional Hearing Dates and Focus Areas Jan. 2021	
039	Opperman to Cheng RE: participation/translation	Hearsay, FRE 802
040	Opperman To Rivera RE: participation/translation	Hearsay, FRE 802
041	Email between Sean Opperman and Sarah Becker	Hearsay, FRE 802
042	Emails between Sean Opperman and Stephanie Swanson	Hearsay, FRE 802

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
043	Sean Opperman forwarding Census data just released	
044	Senate Committee (Huffman) announcement Census Data	Hearsay, FRE 802
045	Email from Opperman to Bledsoe RE hearing test/participation	Hearsay, FRE 802
046	Email from Opperman to Perales RE hearing test/participation	Hearsay, FRE 802
047	Email from Opperman to Murray RE hearing test/participation	Hearsay, FRE 802
048	Email from Opperman to Garcia RE hearing test/participation	Hearsay, FRE 802
049	Email from Opperman to Oler RE hearing test/participation	Hearsay, FRE 802
050	Email b/w Sean Opperman and Ashley Cheng	Hearsay, FRE 802
051	Email from Sean Opperman to LULAC RE SB 6	Hearsay, FRE 802
052	Opperman to Michael Li RE SB 6 hearing/participation	Hearsay, FRE 802
053	Letter from Congressman John Carter in support of SB6.	Hearsay, FRE 802
054	Letter from Congressman Randy Weber in support of SB6.	Hearsay, FRE 802
055	Public Testimony by Zoom Instructions	Relevance FRE 401/402, Hearsay 802
056	Notification of regional public testimony hearings in spanish	
057	Regional hearing public posting notice	
058	Agenda Senate Rd Committee regional hearing. Dr Potter testifying. 2/4/21	
059	Senate redistricting committee September 2021 regional public input hearings schedule	
060	Letter from Sen. Huffman's office to Miguel Rivera	Hearsay, FRE 802
061	Sean Opperman email to Stephanie Swanson, Joaquin Gonzalez and Matthew Simpson re: regional hearing dates and focus areas	Hearsay, FRE 802

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
062	Letter from Sen. Huffman's office to Miguel Rivera	Hearsay, FRE 802
063	Senate Rd Committee announcement letter on regional hearings 1/21/21	
064	Portal public posting notice in Spanish inviting public comment	
065	TLC Redistricting Timeline (fwd-looking)	Hearsay, FRE 802; Foundation, FRE 602
066	Nina Perales' Witness Registration Card	Hearsay, FRE 802; Foundation, FRE 602
067	Letter of Rep. Hunter soliciting House members' redistricting proposals	Hearsay, FRE 802
068	Sep. 30, 2021 Ltr. from Rep. Johnson to Chair Hunter re CD30	Hearsay, FRE 802
069	March 1st, 2022 primary election calendar.	
070	Notice to High School Principals Re: Voter Registration	
071	SOS Election Handout in Spanish	
072	SOS Election Handout in English	
073	SOS Email to High School Principals RE: Voter Registration	
074	Notice to High School Students or Employees Registering to Vote in English and Spanish	
075	Order form High School Voter Registration Applications	
076	Texas Administrative Code Re Directive for High School Deputy Registrars	
077	Congressman Brady to Hunter letter in support	Hearsay, FRE 802
078	10/12/2011: Email from Rep. Cochran	
079	Bexar Cnty. House Delegation letter support PlanH2230	
080	Gov. Proclamation 9/7/21 Redist Special Session	
081	Gov. Proclamation 8/5/21 Redist Special Session	
082	April 1, 2021 House Comm. Agenda	
083	April 20, 2021 House Comm. Agenda	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
084	Sep. 13, 2021 House Comm. Agenda	
085	Tx Redistricting Legal Requirements	
086	Summary of Texas Redistricting Process TLC	
087	Oct. 15, 2021 House Agenda	
088	Prefiled Senate Committee Amendments SB4 Plans S2103, S2108, S2112, S2113, S2117, S2119, S2120, S2120, S2121, S2122, S2126	
089	Open Letter of Brian Birdwell "Senate Redistricting Committee Seeks Public Input"	Hearsay, FRE 802
090	Incoming Correspondence Report 01/26/2021	
091	Sep. 2021 Senate Comm. Public Hearings	
092	Senate Comm. Report - SB6	
093	Senate RD Committee Hearing Notice 10/29/2019	
094	Dist. Pop. Analysis - Plan C2102	
095	C2104 report package	
096	C2105 report package	
097	Dist. Pop. Analysis - Plan C2106	
098	C2107 report package	
099	C2108 report package	
100	C2109 Capitol Data Portal report package	
101	Report package	
102	Report package	
103	Report package	
104	Dist. Pop. Analysis - Plan C2133	
105	Dist. Pop. Analysis - Plan C2139	
106	C2141 report package	
107	Report package	
108	Report package	
109	Dist. Pop. Analysis - Plan C2175	
110	Report package	
111	Dist. Pop. Analysis - Plan E2109	
112	E2111 report package	
113	E2112 report package	
114	Dist. Pop. Analysis - Plan E2113	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
115	Report package	
116	Report package	
117	H2103 report package	
118	Dist. Pop. Analysis - Plan H2104	
119	Dist. Pop. Analysis - Plan H2107	
120	Dist. Pop. Analysis - Plan H2109	
121	Dist. Pop. Analysis - Plan H2110	
122	H2112 report package	
123	Dist. Pop. Analysis - Plan H2115	
124	Dist. Pop. Analysis - Plan H2119	
125	Dist. Pop. Analysis - Plan H2127	
126	H2130 report package	
127	Dist. Pop. Analysis - Plan H2132	
128	H2135 report package	
129	Dist. Pop. Analysis - Plan H2137	
130	H2138 report package	
131	Dist. Pop. Analysis - Plan H2140	
132	Dist. Pop. Analysis - H2142	
133	Dist. Pop. Analysis - Plan H2143	
134	Dist. Pop. Analysis - Plan H2149	
135	Dist. Pop. Analysis - Plan H2153	
136	Red-100T district population analysis with county subtotals	
137	Red-100T county subtotals	
138	H2161 report package	
139	H2163 report package	
140	Dist. Pop. Analysis - Plan H2166	
141	Capitol Data Portal H2168 report package	
142	Capitol Data Portal H2170 report package	
143	Dist. Pop. Analysis - Plan H2172	
144	Dist. Pop. Analysis - Plan H2175	
145	Dist. Pop. Analysis - Plan H2179	
146	Dist. Pop. Analysis - Plan H2813	
147	Dist. Pop. Analysis - Plan H2184	
148	Report package	
149	Dist. Pop. Analysis - Plan H2186	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
150	Dist. Pop. Analysis - Plan H2187	
151	Dist. Pop. Analysis - Plan H2193	
152	Dist. Pop. Analysis - Plan H2196	
153	Dist. Pop. Analysis - Plan H2197	
154	Capitol Data Portal H2199 report package	
155	Dist. Pop. Analysis - Plan H2200	
156	Dist. Pop. Analysis - Plan H2203	
157	Dist. Pop. Analysis - Plan H2205	
158	Dist. Pop. Analysis - Plan H2206	
159	Dist. Pop. Analysis - Plan H2208	
160	Dist. Pop. Analysis - Plan H2209	
161	Dist. Pop. Analysis - Plan H2211	
162	Dist. Pop. Analysis - Plan H2213	
163	Dist. Pop. Analysis - Plan H2215	
164	Dist. Pop. Analysis - Plan H2216	
165	Dist. Pop. Analysis - Plan H2217	
166	Dist. Pop. Analysis - Plan H2218	
167	Dist. Pop. Analysis - Plan H2225	
168	Dist. Pop. Analysis - Plan H2228	
169	Dist. Pop. Analysis - Plan H2230	
170	Dist. Pop. Analysis - Plan H2234	
171	Dist. Pop. Analysis - Plan H2238	
172	Dist. Pop. Analysis - Plan H2240	
173	Dist. Pop. Analysis - Plan H2241	
174	Dist. Pop. Analysis - Plan H2244	
175	Dist. Pop. Analysis - Plan H2245	
176	Dist. Pop. Analysis - Plan H2246	
177	Dist. Pop. Analysis - Plan H2247	
178	Dist. Pop. Analysis - Plan H2252	
179	Dist. Pop. Analysis - Plan H2257	
180	Dist. Pop. Analysis - Plan H2262	
181	Dist. Pop. Analysis - Plan H2263	
182	Dist. Pop. Analysis - Plan H2266	
183	Dist. Pop. Analysis - Plan H2267	
184	Dist. Pop. Analysis - Plan H2275	
185	Dist. Pop. Analysis - Plan H2276	



<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
186	Dist. Pop. Analysis - Plan H2279	
187	Dist. Pop. Analysis - Plan H2281	
188	Dist. Pop. Analysis - Plan H2283	
189	Dist. Pop. Analysis - Plan H2284	
190	report package	
191	Dist. Pop. Analysis - Plan H2293	
192	Dist. Pop. Analysis - Plan H2296	
193	Dist. Pop. Analysis - Plan H2298	
194	Dist. Pop. Analysis - Plan H2300	
195	Report package	
196	Dist. Pop. Analysis - Plan H2306	
197	Dist. Pop. Analysis - Plan H2307	
198	Dist. Pop. Analysis - Plan H2310	
199	Dist. Pop. Analysis - Plan H2312	
200	Dist. Pop. Analysis - Plan H2314	
201	Pop. and Voter Data - Plan H2317	
202	Dist. Pop. Analysis - Plan H2318	
203	Capitol Data Portal S2113 report package	
204	Dist. Pop. Analysis - Plan S2118	
205	Dist. Pop. Analysis - Plan S2125	
206	S2134 Capitol Data Portal report package	
207	Report package	
208	Dist. Pop. Analysis - Plan S2141	
209	Dist. Pop. Analysis - Plan S2142	
210	Dist. Pop. Analysis - Plan S2148	
211	Report package	
212	Dist. Pop. Analysis - Plan S2164	
213	Red-100T district population analysis with county subtotals	
214	S2172 Capitol Data Portal report package	
215	House Redistricting Committee Members Roster	
216	Notice of Public Hearing, April 8, 2021	
217	Notice of Public Hearing, May 1, 2021	
218	Notice of Public Hearing, July 6, 2021	
219	Notice of Public Hearing, July 7, 2021	
220	Notice of Public Hearing, Sept. 13, 2021	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
221	Letter of Rep. Morales and Rep. Fierro in support of amendment, PLANH2118, to PLANH2101	
222	Letter of Reps. Rodriguez, Howard, Israel, Hinojosa, Goodwin, Cole in support of PLANH2116 amending PLANH2101	
223	Notice of Public Hearing, Oct. 4, 2021	
224	Notice of Public Hearing, Oct. 5, 2021	
225	US Rep Green ltr. to Chair Hunter	
226	Oct. 7, 2021 Ltr. from Cong. Lee to Chair Hunter re 18th	
227	Notice of Public Hearing, Oct. 13, 2021	
228	Senate redistricting committee notice of public hearing 1/25/21	
229	Notice of Public Hearing, Jan. 6, 2021	
230	Notice of Public Hearing, Jan. 27, 2021	
231	Senate redistricting committee notice of public hearing 1/28/2021	
232	Senate redistricting committee notice of public hearing 1/29/21	
233	Senate redistricting committee hearing notice 2/2/21	
234	Senate redistricting committee notice of public hearing 2/3/2021	
235	Senate Redistricting Committee Notice of Public Hearing 2/4/2021	
236	Senate redistricting committee hearing notice 2/12/21	
237	Senate Redistricting Committee Notice of Public Hearing 3/11/2021	
238	Senate Redistricting Committee notice of public hearing 3/12/2021	
239	Notice of Public Hearing, March 13, 2021	
240	Senate Comm. on Redist Minutes 9/24/21	
241	9/25/2021 Senate Redistricting Committee Minutes	
242	Sep. 28, 2021 Sen. Comm. Minutes	
243	Minutes Senate Committee 09/30/2021	
244	Oct. 4, 2021 Senate Comm. Minutes	

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
245	Oct. 15, 2021 Senate Comm. Minutes	
246	Oct. 4, 2021 House Comm. Report - HB1	
247	HB1 House Research Organization bill analysis	
248	Red-100T district population analysis with county subtotals	
249	TLO Journal 87(3) - HB 1	
250	TLO List of pre-filed amendments 05/16/22	
251	Engrossed Bill - SB4	
252	Sen. Huffman SB 4 Analysis	
253	Bill Digest SB 4 10/15/2021	
254	TLO List of Amendments to SB 4	
255	TLO pre-filed amendments to SB 4	
256	Conference Committee Report	
257	Oct. 13, 2021 - House Comm. Report	
258	Bill Digest SB 6 10/16/2021	
259	Dist. Pop. Analysis - Plan C2101	
260	TLO list of amendments to SB 6	
261	TLO House pre-filed amendments to SB 6	
262	SB7 Bill Analysis	
263	Summary of Committee Action concerning SB 7 10/11/2021	
264	Oct. 15, 2021 House Research Org. Bill Digest - SB 7	
265	SB7 Senate Comm. Report	
266	TLO list of amendments to SB 7	
267	TLO House pre-filed amendments to SB 7	
268	Notice of Public Hearing (Revision), April 1, 2021	
269	July 7, 2021 House Comm. Agenda	
270	Notice of Public Hearing - July 7, 2021	
271	Map - Plan H358	
272	House Notice of Public Hearing, July 13, 2021	
273	Notice of Public Hearing, March 18, 2021	
274	Notice of Public Hearing, March 18, 2021	
275	Notice of Public Hearing, April 1, 2021	
276	Notice of Public Hearing, April 8, 2021	

Defendants' Exhibit Number	Description	Objections
277	Notice of Public Hearing, May 1, 2021	
278	Notice of Public Hearing, July 6, 2021	
279	Notice of Public Hearing, July 13, 2021	
280	Notice of Public Hearing, July 17, 2021	
281	Notice of Public Hearing, Sept. 8, 2021	
282	Notice of Public Hearing, Sept. 15, 2021	
283	Notice of Public Hearing, Sep. 18, 2021	
284	Notice of Public Hearing, Oct. 4, 2021	
285	Notice of Public Hearing, Oct. 11, 2021	
286	August 23, 2021 press release Texas House Democrats Correct House GOP Members' Misrepresentation of Special Session Quorum Cautioning: A Quorum is not Perpetual	Hearsay, FRE 802
287	Redistricting public hearings schedule	
288	Dist. Pop. Analysis - Hosue Dists. PLANH2119	
289	Dist. Pop. Analysis - House Dists. PLANH2263	
290	Marked Exhibit - Article "Dozens attend the State of Black Community Forum in Killeen"	Hearsay, FRE 802
291	Liz Campos tweet sine die 3rd special session	
292	Dist. Pop. Analysis - House Dists. PLANH2228	
293	Dist. Pop. Analysis - House Dists. PLANH2276	
294	Tx. House Dems Press Release RE: Quorum	Hearsay, FRE 802
295	Canales Tweet Democratic partisan redistricting efforts	Hearsay, FRE 802; Authenticity, FRE 901
296	State District Courts	
297	Court of Appeals (Eff. 9/1/2005)	Relevance, FRE 401/402
298	Administrative Judicial Regions	Relevance, FRE 401/402
299	Article "Republicans more than doubled turnout in the Rio Grande Valley compared with the last midterm primary"	Hearsay, FRE 802
300	Article "The Rio Grande Valley's political landscape is changing amid midterm, governor elections"	Hearsay, FRE 802
301	June 7, 2021 NY Times article "Republicans win two Texas mayoral races, including one in McAllen, which is 85 percent Hispanic"	Hearsay, FRE 802
302	Election Results Special Election CD34	

Defendants' Exhibit Number	Description	Objections
303	Letter from Rio Grande Valley delegation to Chair Hunter	
304	Dist. Pop. Analysis - House Dists. PLANH2235	
305	2021 Redistricting Guide - TLC	
306	House Redistricting Committee members	
307	PlanH2276 Map	
308	PlanH2276 Map Precincts	
309	House Redistrict Committee Notice of Public Hearing April 1, 2021	
310	House Redistricting Committee Notice of Public Hearing September 8, 2021	
311	2022 Rep. Primary Results HD31	Authenticity, FRE 901; Foundation, FRE 602
312	Senate Resolution No. 4	
313	Trib article political motivations RE: redistricting	Hearsay, FRE 802
314	Minutes, Sen. Com. on Redist. 9/28/21	
315	NBC Article, Texas Results Hint GOP Hispanic Gains May Endure Post-Trump, March 11, 2022.	Hearsay, FRE 802
316	Dist. Pop. Analysis - Cong. Dists. PLANC2149	
317	Dist. Pop. Analysis - SBOE Dist. SBOE PLANE2119	
318	Dist. Pop. Analysis - House Dists. PLANH2127	
319	Redistricting Committee Hearings List	
320	Dist. Pop. Analysis - House Dists. PLANH2195	
321	Proposed CD23	
322	Map PlanH2276 (118-120 only)	
323	ACS Tabulation - House Dists. 118-20 12/12/21	
324	Weekly briefing email from Rep. Jetton on redistricting	
325	Map of Texas Counties - West Texas Shading	Authenticity, FRE 901; Foundation, FRE 602
326	Map - State House Districts - Deviation from Ideal Dist. Pop. - 2020 Census	
327	John Lujan flyer HD118 Special Election	
328	Trib. Article Lujan (R) win HD118	Hearsay, FRE 802
329	House Dist. Pop PlanH2276	

Defendants' Exhibit Number	Description	Objections
330	Bexar Cnty. Delegation map submission to Hunter	
331	Dist. Pop. Analyss - House Dists. PLANH2228	
332	Dist. Pop. Analysis - House Dist. PLANH2276	
333	House Districts Population PlanH2209	
334	Public meetings on redistricting	
335	7/14/21 Texas Tribune Article re Democratic members of the Texas House and Senate who left the state to impede passage of legislation	Hearsay, FRE 802
336	Dist. Pop. Analysis - House Dists. PLANH2228	
337	PlanC2194 is Minjarez Demo Plan	Authenticity, FRE 901; Foundation, FRE 602
338	News Article RE: Quorum Restored	Hearsay, FRE 802
339	Moody Pro Tempore Appointment	
340	July 19, 2021 Rep. Murr press release Creating Consistency for Fair and Uniform Elections	Hearsay, FRE 802
341	9/21/21 email - Gover to Mackin/opperman	
342	Tex Rep District 90 2020 Election Results	
343	Message regarding Democrat quorum	Hearsay, FRE 802; Authenticity, FRE 901
344	ACS Data House Dists. PlanH2101	
345	Third Special Session Thompson testimony	Completeness, FRE 106, Foundation, FRE 602
346	House District Population PlanH2187	
347	Dist. Pop. Analysis - Cong. Dists. PLANC2153	
348	Dist. Pop. Analysis - House Dists. - PLANH2110	
349	House District PLANH2187 District Population Analysis	
350	Dems political considerations restoring quorum	Hearsay, FRE 802
351	Archer Declaration (TLC Director)	Hearsay, FRE 802
352	Dist. Pop. Analysis - Cong. Dists. PLANC2195	
353	House Members 87th Lege	
354	Houston City Council Members	Foundation, FRE 602
355	Harris County Elected Officials	Foundation, FRE 602
356	Dist. Pop. Analysis - Cong. Dists. PLANC2195	

Defendants' Exhibit Number	Description	Objections
357	PBS Newshour Report "Gerrymandering Texas could help Republicans take back the House in 2022" (6/22/2021)	Hearsay, FRE 802
358	Members, 87th Senate	
359	Denton County Precinct Maps	
360	Denton County Precinct Maps	
361	Congressional Districts Population PlanC2195	
362	Courts of Appeals Districts	
363	Administrative Judicial Regions	
364	House Districts Pop. PlanH2101	
365	2018 election results	
366	San Antonio Express-News article "Commentary: Dems must listen to Latinos to connect with them" (9/12/22)	Hearsay, FRE 802
367	Webpage - Arlington City Council Members	Foundation, FRE 602
368	Fort Worth Elected Officials	Foundation, FRE 602
369	VOA article (3/5/2022), Republicans Make Headway in Texas' Booming Latino Communities	Hearsay, FRE 802
370	Politico Article: The GOP is gaining among Texas Hispanics. Women are leading the charge.	Hearsay, FRE 802
371	Google maps screengrab for DFW Area	
372	Bell Cnty. DA (Garza) Bio	
373	Killeen ISD Board Members	
374	Map - State Sen. Dists. Est. Pop. Change 2009-13 & 2014-18	
375	Opperman to Garry Jones re drafting maps without racial data (9/17/2021)	Hearsay, FRE 802
376	Sen. Sp. Comm. on Redist. - 9/24/2021	
377	Letter Powell to Huffman RE: Participation	
378	Senate Incumbents POWBS2018	
379	Map - Sen. Dists. - Plan 3 - POWBS2019	
380	Senate Dist. 10 Baseline Deviation from Ideal	
381	Potter Pres. to Sen. Select Redist. Comm. - 10/29/2019	
382	SD10 Electoral History - 2002 to 2018	
383	SD10 election performance 2002-18	

Defendants' Exhibit Number	Description	Objections
384	Map - Sen. Pop. Deviation	
385	Governor Abbott Proclamation Third Called Session	
386	2020 Census Redistricting Data cover sheets 8/12/21	
387	Examples of the Senate Adopting Plans Offered by Democratic Senators	
388	Senate Redistricting Committee Hearing Notices/Minutes	
389	House Hearing Notices	
390	Notice of Cancelled House Redist. Hearing (7/13/2021)	
391	Breaking Quorum Images/Tweets/coverage	Hearsay, FRE 802
392	EI Voting Analysis S2100 2012 to 2020	Hearsay, FRE 802; Foundation, FRE 602; Undisclosed Expert Testimony, FRCP 26
393	EI Voting Analysis SD10 2014 Democratic Primary	Hearsay, FRE 802; Foundation, FRE 602; Undisclosed Expert Testimony, FRCP 26
394	SD31 electoral history 2014, 2018	
395	HD 90 electoral history 1996-2020	
396	CD33 electoral history 2012-2020	
397	North Texas Partisan Shading Map Senate Plan S2100 (2020 Presidential election)	
398	Jan. 22, 2019 Texas Tribune article "Lt. Gov. Dan Patrick pulls Sen. Kel Seliger's chairmanship after Seliger suggested Patrick aide kiss his 'back end'"	Hearsay, FRE 802
399	Trib. article Buckingham Land Commissioner run.	Hearsay, FRE 802
400	Texas Tribune Article September 21, 2021	Hearsay, FRE 802
401	Amarillo Pioneer article RE: Seliger retiring	Hearsay, FRE 802
402	SD31 Analysis	
403	SD9 Analysis	
404	SD9 Electoral History	
405	Texas Sec. of State Election Advisory 2021-14	



<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
406	Texas Secretary of State Election Advisory 2021-18	
407	SD10 CHANGE IN PARTISAN POPULATION MAP	
408	Texas Secretary of State Election Advisory 2021-23	
409	Important Election Dates 2021-2022	
410	Keith Ingram Declaration	Hearsay, FRE 802
411	Declaration of County Judge David Blackburn (12/20/2021)	Hearsay, FRE 802
412	Declaration of Collin County Elections Administrator Bruce Sherbet	Hearsay, FRE 802
413	Declaration of Kendall County Elections Administrator Staci Decker	Hearsay, FRE 802
414	Comparison of S2100 and S2168, Performance of SD10 in Statewide Elections 2012 to 2020	
415	Election Analysis S2100 2012 General Election	
416	Tarrant County precincts	
417	Plan Overlap Population Analysis Plan S2168 Compared with PlanS2100 2020 General Election	
418	Senate Districts POWBS2020 comparison w/ PlanS2168	
419	Sen. Dists. - POWB2020 Compared with PLANS2100	
420	2020 Election Data POWBS2020	
421	Examples of the Senate adopting plans offered by Democratic Senators S2120 S2126 S2139 S2167	
422	Article "Latest House Results Confirm 2018 wasn't a Blue Wave. It was a Blue Tsunami", CNN	Hearsay, FRE 802
423	Election Results 2002-2018 North Central Texas	
424	Austin American-Statesman, 1/24/19, Patrick criticizes Seliger's attitude, lack of teamwork	Hearsay, FRE 802
425	Tex. Tribune Art. re Seliger - 10/7/21	Hearsay, FRE 802
426	Back Mike - Tex. Leg. 2021 Cons. to Lib.	Hearsay, FRE 802
427	Article "Analysis: the 2021 Texas Senate, from left to right", Texas Tribune	Hearsay, FRE 802

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
428	Amarillo Pioneer Article re Seliger (10/20/21)	Hearsay, FRE 802
429	TLC Redistricting timeline/deadlines	
430	Trib Article Seliger Stripped of Chairmanship	Hearsay, FRE 802
431	R Primary 2014 Results	
432	2018 Republican Party Primary Election Summary Report	
433	Declaration of Bruce Sherbet	Hearsay, FRE 802
434	SecState Election Advisory No. 2021-18	
435	House Redistricting Committee Notice of Public Hearing July 7, 2021	
436	House Redistricting Committee cancellation notice public hearing July 13, 2021	
437	Rep. Turner Tweet Aug. 6, 2021	Hearsay, FRE 802
438	Chris Turner intentional quorum break	Hearsay, FRE 802
439	SD10 Electoral History, 2002 to 2018	
440	SecState Election Advisory No. 2021-18	
441	Election Law Calendar May 7, 2022	
442	SB13 from the 87th Legislature, 3rd called session.	
443	Ex 6 to Ansolabehere Depo - Am. Pol. Sci. Rev. Paper 2024	Hearsay, FRE 802
444	Texas Politics Project Latino Voting Trends	Hearsay, FRE 802
445	Statewide Races Results 2018-22	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802
446	Grumbach Depo Ex. 6 - Prez/Senate results 2024	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802
447	Latino trends interview transcript	Hearsay, FRE 802
448	Pres 2024/Gov 2022 Results	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802
449	Grumbach Depo Exhibit CCA 7 election/google results	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802
450	Grumbach Depo Exhibit CD15 HD 37 HD115 SD27 Results	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
451	Morales Depo Exh. Senate Plans List	
452	District Viewer Plan List House	
453	District Viewer Plan List Congress	
454	Zoom C2197 GMaps Railroad Tracks	Authenticity, FRE 901; Foundation, FRE 602
455	Map C2195 Zoom Railroad Tracks	Authenticity, FRE 901; Foundation, FRE 602
456	C2195 GMaps Zoom Railroad Tracks	Authenticity, FRE 901; Foundation, FRE 602
457	Rush Depo Exh. CD 15 historical election results	Authenticity, FRE 901; Foundation, FRE 602; Hearsay, FRE 802
458	Election History SD 27	
459	Bio of Rep. Janie Lopez	Hearsay, FRE 802
460	Rush Old CV	
461	Lujan Reelection News Article	Hearsay, FRE 802
462	Office of Secretary of State Race Summary Report 2018 Republican Party Primary Election	
463	Office of the Secretary of State Race Summary Report 2014 Republican Party Primary Election	
464	Kel Seliger Not seeking reelection article	Hearsay, FRE 802
465	Declarations/Articles for Def's opposition to PI	Hearsay, FRE 802
466	Email Correspondence from Beverly Powell to Kel Seliger re State filing link	
467	Article "Patrick criticizes Seliger's attitude, lack of teamwork", Austin American-Statesman	Hearsay, FRE 802
468	June 16, 2021 Texas Tribune, Texas Legislature 2021, "Analysis: The 2021 Texas Senate, from left to right." by Mark P. Jones	Hearsay, FRE 802
469	Redistricting Dates of Interest timeline - Feb. 2020	
470	Office of the Secretary of State Race Summary Report 2018 Republican Party Primary Election	
471	Office of the Secretary of State Race Summary Report 2014 Republican Party Primary Election	
472	Article "Patrick criticizes Seliger's attitude, lack of teamwork", Austin American-Statesman	Hearsay, FRE 802

<b>Defendants' Exhibit Number</b>	<b>Description</b>	<b>Objections</b>
473	Redistricting Timeline	Hearsay, FRE 802; Foundation, FRE 602
474	CD18 Sheila Jackson Lee 2022 General	
475	CD30 Jasmine Crockett 2022 General	
476	CD9 Al Green 2022 General	
477	CD 30 Jasmine Crockett 2022 Primary	
478	CD18 Sheila Jackson lee 2022 Primary	
479	CD9 Al Green 2022 Primary	
480	CD18 Sylvester Turner 2024 General	
481	CD30 Jasmine Crockett 2024 General	
482	CD9 Al Green 2024 General	
483	CD18 Sheila Jackson Lee 2024 Primary	
484	CD30 Jasmine Crockett 2024 Primary	
485	CD9 Al Green 2024 Primary	
486	Christina Morales 2022 General	
487	Eddie Morales 2022 General	
488	Mary Gonzalez 2024 General	
489	Penny Morales Shaw 2022 General	
490	Rafael Anchia 2022 General	
491	Eddie Morales CD 74 2022 Primary	
492	HD 103 Rafael Anchia 2022 Primary	
493	HD 140 Armando Walle 2022 Primary	
494	HD 145 Christina Morales 2022 Primary	
495	HD 148 Penny Morales Shaw	
496	HD 45 Erin Zwiener 2022 Primary	
497	HD 75 Mary Gonzalez 2022 Primary	
498	HD 77 Lina Ortega 2022 Primary	
499	HD 78 Joe Moody 2022 Primary	
500	HD 79 Claudia Ordaz 2022 Primary	
501	HD 80 Tracy O King 2022 Primary	
502	HD 90 Ramon Rivera 2022 Primary	
503	GD77 Vince Perez 2024 General	
504	HD104 Rafael Anchia 2024 General	
505	HD140 Armando Walle 2024 General	
506	HD145 Christina Morales 2024 General	
507	HD148 Penny Morales Shaw 2024 General	

Defendants' Exhibit Number	Description	Objections
508	HD74 Eddie Morales 2024 General	
509	HD75 Mary Gonzalez 2024 General	
510	HD78 Joe Moody 2024 General	
511	HD79 Claudia Ordaz 2024 General	
512	HD90 Ramon Romero 2024 General	
513	HD 140 Armando Walle 2024 Primary	
514	HD103 Rafael Anchia 2024 Primary	
515	HD145 Christina Morales 2024 Primary	
516	HD148 Penny Morales Shaw 2024 Primary	
517	HD74 Eddie Morales 2024 Primary	
518	HD75 Mary Gonzalez 2024 Primary	
519	HD77 Vince Perez 2024 Primary	
520	HD78 Joe Moody 2024 Primary	
521	HD79 Claudia Ordaz 2024 Primary	
522	HD90 Ramon Romero 2024 Primary	
523	Imai Article	Hearsay, FRE 802
524	Article "Donald Trump wins Texas", Politico	Hearsay, FRE 802
525	Article "Ted Cruz wins Texas Senate seat", Politico	Hearsay, FRE 802
526	Congressional Districts Deviation from Ideal District Size	
527	EX. 2 to Saenz Depo Data Re Texas Native-Born Citizens Age 25 to 54 by Race/Ethnic Group, 2019	Hearsay, Foundation
528	EX. 5 to Saenz Depo, Article in Mexican American Civil Rights Institute's "Brown Papers" State's Demo 5	Hearsay
529	House Journal Supplement 87th Legislature Sept. 20, 2021	
530	TLO House Committee Meetings 2021	
531	planh2276_r116_acs1721	
532	House Journal for Day 4, October 12, 2021	
533	Representative Crockett's Website	
534	District Overlay C2177 with C2193	
535	H2316 with H2276 Overlay	
536	Letter from Civil Rights Organizations to Huffman	Hearsay; Authenticity

Defendants' Exhibit Number	Description	Objections
537	Senator Juan Chuy Hinojosa Press Release - Jan. 25, 2021	Hearsay; Hearsay within Hearsay
538	Declaration from Phil King	Hearsay; Foundation
539	Hearing Cancellation Notice March 25, 2020	
540	TLO Redistricting Hearings 2019-2020	
541	Super Neighborhoods Houston Website Printout Greater Third Ward	Hearsay
542	Brooks_000015 email	Hearsay; Foundation; Authenticity
543	How Donald Trump Has Remade America's Political Landscape	Hearsay; Foundation

Dated: May 30, 2025

Respectfully submitted,

**For LULAC Plaintiffs:**

**For Gonzales Plaintiffs:**

/s/ Nina Perales

Nina Perales  
 Julia Longoria  
 Sabrina Rodriguez  
 Mexican American Legal Defense and Educational Fund (MALDEF)  
 110 Broadway Street, Suite 300  
 San Antonio, TX 78205  
 (210) 224-5476  
 (210) 224-5382  
 nperales@maldef.org  
 jlongoria@maldef.org  
 srodriguez@maldef.org

Ernest I. Herrera  
 Mexican American Legal Defense and Educational Fund (MALDEF)  
 634 S. Spring Street, 9<sup>th</sup> Floor  
 Los Angeles, CA 90014  
 (210) 629-2512  
 eherrera@maldef.org

/s/ David R. Fox

David R. Fox\*  
 Richard A. Medina\*  
 Elias Law Group LLP  
 250 Massachusetts Ave. NW, Suite 400  
 Washington, D.C. 20001  
 Telephone: (202) 968-4490  
 dfox@elias.law  
 rmedina@elias.law

Abha Khanna\*  
 Elias Law Group LLP  
 1700 Seventh Ave, Suite 2100  
 Seattle, WA 98101  
 Telephone: (206) 656-0177  
 akhanna@elias.law  
 Renea Hicks  
 Attorney at Law  
 Texas Bar No. 09580400  
 Law Office of Max Renea Hicks  
 P.O. Box 303187

Andrea E. Senteno\*  
Mexican American Legal Defense and Educational  
Fund (MALDEF)  
1016 16<sup>th</sup> Street, Suite 100  
Washington, DC 20036  
(202) 293-2828  
Asenteno@maldef.org

Khrystan N. Policarpio\*  
Mexican American Legal Defense and Educational  
Fund (MALDEF)  
1512 14<sup>th</sup> Street  
Sacramento, CA 95814  
(916) 444-3031  
kpolicarpio@maldef.org

**For MALC Plaintiffs:**

/s/ Sean J. McCaffity  
George (Tex) Quesada  
State Bar No. 16427750  
Email: quesada@texttrial.com  
Sean J. McCaffity  
State Bar No. 24013122  
Email: smccaffity@texttrial.com  
3811 Turtle Creek Boulevard, Suite 1400  
Dallas, Texas 75219-4461  
214/720-0720 (Telephone)  
214/720-0184 (Facsimile)

Joaquin Gonzalez  
Texas Bar No. 24109935  
1055 Sutton Dr.  
San Antonio, TX 78228  
jgonzalez@malc.org

**For Plaintiff Texas NAACP:**

/s/ Lindsey B. Cohan  
Lindsey B. Cohan  
Dechert LLP  
515 Congress Avenue, Suite 1400

Austin, Texas 78703-0504  
(512) 480-8231  
rhicks@renea-hicks.com

**For Brooks Plaintiffs:**

/s/ Chad W. Dunn  
Chad W. Dunn (Tex. Bar No.  
24036507)  
Brazil & Dunn  
4407 Bee Caves Road  
Building 1, Ste. 111  
Austin, TX 78746  
(512) 717-9822  
chad@brazilanddunn.com

/s/ Mark P. Gaber  
Mark P. Gaber\*  
Mark P. Gaber PLLC  
P.O. Box 34481  
Washington, DC 20043  
(715) 482-4066  
mark@markgaber.com

Jesse Gaines\* (Tex. Bar. No. 07570800)  
P.O. Box 50093  
Fort Worth, TX 76105  
817-714-9988  
gainesjesse@ymail.com

Molly E. Danahy\*  
P.O. Box 51  
Helena, MT 59624  
(406) 616-3058  
danahy.molly@gmail.com

Sonni Waknin\*  
10300 Venice Blvd. # 204  
Culver City, CA 90232  
732-610-1283  
sonniwaknin@gmail.com

**For Plaintiff-Intervenors:**

Austin, TX 78701  
(512) 394-3000  
lindsey.cohan@dechert.com

/s/  
Gary Bledoe  
The Bledsoe Law Firm PLLC  
6633 Highway 290 East #208  
Austin, TX 78723  
(512) 322-992  
gbledsoe@thebledsoelawfirm.com

\*Admitted *pro hac vice*



**CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 30, 2025, and that all counsel of record were served by CM/ECF.

/s/ Lindsey B. Cohan